



NANP Administration Services

Scope of Work Change Proposal #2

INC Issue 794: Update 555 NXX Assignment Guidelines to Reflect a Moratorium on New Assignments

May 22, 2015

Table of Contents

1	Introduction	1
1.1	Purpose and Scope.....	1
1.2	Modification of Guidelines.....	1
2	Proposed Industry Numbering Committee (INC) Scope of Work Change	2
3	Neustar’s Proposed Solution	2
4	Assumptions and Risks.....	3
5	Cost Assumptions and Summary.....	4
6	Conclusion.....	4

1 Introduction

1.1 Purpose and Scope

In accordance with Neustar’s contract¹ and our constant effort to provide the best support and value to both the Federal Communications Commission (FCC) and the telecommunications industry, Neustar, as the North American Numbering Plan Administrator (NANPA), hereby submits this scope of work change to the FCC for approval. This scope of work change is in compliance with NANPA’s Change Management protocol and per requirements as outlined in the NANPA Contract FCC12C0023, Section H.4 (Technical and System Changes), Item 5, which states the following:

“If and when a change to the NANPA system is adopted by the NANC or the INC, the contractor’s liaison shall ensure that the proposed change is forwarded to the Contracting Officer and the Contracting Officer’s Representative (COR). No change shall be binding until such modification is issued, nor shall the Government be liable for any costs associated with a system change until such modification is issued.”

1.2 Modification of Guidelines

Pursuant to NeuStar’s contract, the NANPA shall participate in the development and modification of guidelines and procedures, which may affect the performance of the NANPA functions. These changes may be derived from regulatory directives and/or modifications to guidelines. In addition, new guidelines may be developed as appropriate to comply with regulatory directives. The NANPA shall adopt and implement any changes that are consistent with regulatory directives after they are officially adopted, recognizing that some may constitute a change in the scope of work.²

When the Industry Numbering Committee (INC) places any changes to its guidelines in initial closure, the NANPA shall submit an assessment regarding the impact of scope of work, time and costs to the INC, the North American Numbering Council (NANC) and the FCC within 30 days.³

This document provides detailed information pertaining to the INC’s requirement that went to initial closure on May 15, 2015. This change order document covers the required subject matters such as explaining the industry’s requirements, proposed solution, costs, risks and assumptions.

¹ Contract Number FCC12C0023 and the NANPA Technical Requirements Document, Attachment A, effective July 9, 2012.

² NANPA Technical Requirements Document, July 2012, Section 2.10, Modification of Guidelines.

³ NANPA Technical Requirements Document, July 2012, Section 2.10, Modification of Guidelines.

2 Proposed Industry Numbering Committee (INC) Scope of Work Change

During the May 4-7, 2015 INC meeting, INC Issue 794 was resolved and went to Initial Closure on May 15, 2015.

- **INC Issue 794: Update 555 NXX Assignment Guidelines to Reflect a Moratorium on New Assignments**

The official INC issue statement is copied in its entirety below and can also be found on the ATIS website:

A) *ISSUE STATEMENT*

Under INC Issue 788, INC is reviewing the use of 555 line numbers and NANPA is conducting an outreach effort to assignees to determine how many 555 line numbers are actually in service. Based on the initial results of this outreach, it appears that few (if any) are in service, and INC recommends a moratorium on all new assignments of 555 line numbers until INC determines the best use of this resource.

B) *FOLLOWING RESOLUTION FROM INC*

INC placed Issue 794 into initial closure on May 15, 2015, with the following language:

INC agreed to update the 555 NXX Assignment Guidelines with the following text on the cover page: "Effective immediately, there is a moratorium on the assignment of new 555 line numbers. This moratorium does not affect the entertainment and advertising industries current use of fictitious non-working numbers (line numbers 0100-0199) or the use of 555-1212 for directory assistance purposes." INC recognizes that a NANPA change order will need to be approved to implement this resolution.

3 Neustar's Proposed Solution

Based upon the resolution of INC Issue 794, NANPA will cease making assignments of 555 line numbers. Appropriate notification will be made on the NANPA website to inform the user of the moratorium on 555 line number assignments and to direct the user to the INC 555 NXX Assignment Guidelines. To facilitate this education, the 555 NXX Assignment Guidelines will be directly downloadable from the NANPA website.

NANPA proposes to make no changes to the NANP Administration System (NAS) during the moratorium. Presently, users applying for an initial or growth 555 line number must complete a 555 line number request form. This form is also used by 555 line number assignees to update or change information associated with a 555 line number assignment, add additional NPAs for an existing, non-national 555 line number or return a 555 number. Modifying NAS to separate a line number assignment request from the other types of requests would require significant and

costly software development. Further, with the uncertainty associated with the future of this resource, any system modifications at this time would be premature.

With the implementation of INC Issue 794, NANPA will deny any 555 line number assignment application and include a reference in its denial to the moratorium on assignments as noted in the 555 NXX Assignment Guidelines.

4 Assumptions and Risks

As part of its assessment of this change order, NANPA is required to identify the associated assumptions and risks that can have an impact on its operations.

Assumptions:

- The NANPA website will be updated to provide the user with information about the moratorium on the assignment of 555 line numbers.
- NAS will permit users to submit 555 line number assignment applications. NANPA will deny such applications while the moratorium is in place. The applicant may use this denial if it chooses to appeal NANPA's decision to the appropriate regulatory authority.
- 555 line number applications requesting the update of information and/or the return of a number will continue to be processed in accordance with the 555 NXX Assignment Guidelines.
- If approved, implementation of this change order will occur after the publication of the revised 555 NXX Assignment Guidelines. Appropriate notification will be distributed via the NANP Notification System (NNS).

Risks:

- Although only one 555 line number has been assigned in over four years, implementation of a moratorium may generate renewed interest in this resource. Efforts at reclaiming unused 555 line numbers could be impacted as assignees may conclude the "value" of their assigned number has increased, seeing additional assignments are not permitted.
- Since no assignments are permitted during the moratorium, the possibility exists that the regulatory authority may become more involved in the administration of this resource (e.g., receiving applicant appeals for the assignment of a number). As noted above however, the quantity of assignments over the past several years indicates only a small risk of this situation occurring.

5 Cost Assumptions and Summary

The proposed solution for implementation of the INC Issue 794 requires no changes to NAS and minimal impact on NANPA operations. As such, there is no cost associated with this change order.

6 Conclusion

Neustar, as the NANPA, hereby seeks the FCC's approval for this Scope of Work Change. Upon approval by the FCC, NANPA will notify the industry that it is accommodating this Scope of Work change order.